

# Exhibit G

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

-----  
HUONG HOANG,

Plaintiff,

vs.

AMAZON.COM, INC., et al.,

Defendants.  
-----

Videotaped 30(b)(6) Deposition Upon Oral Examination  
of

IMDb.com, INC.

(JOHN CAIRELLA)  
-----

9:01 A.M.

August 2, 2012

1201 Third Avenue, Ste. 1600

Seattle, Washington

Valerie L. Seaton, RPR, CCR

## APPEARANCES

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## THE VIDEOGRAPHER:

DAN BASSETT  
MOBURG, SEATON & WATKINS

## ALSO PRESENT:

HUONG THU HOANG  
CHARLES WRIGHT

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1 A. Yes.

2 Q. Can you show me where in here it says how you  
3 might use information?

4 MS. ROOS: Object to form.

5 A. Well, it gives examples of information that  
6 is provided. I'm not sure I see --

7 Q. (BY MR. SZEGO) But it doesn't tell you how  
8 that information might be used?

9 A. No. I believe that may be referred to in the  
10 main document.

11 Q. Now, you mentioned earlier that you found out  
12 in November of 2008 my client's correct date of birth.  
13 Is that accurate?

14 A. Yes.

15 Q. What information did you use to find out that  
16 date of birth?

17 A. A real name.

18 Q. Where did you obtain her real name?

19 A. From our IPS records.

20 Q. What is IPS records?

21 A. IPS is the tool that we use to process  
22 payment.

23 Q. What specifically does IPS stand for?

24 A. I actually don't remember. I'm sure it's  
25 listed in one of our pages.

1 Q. IMDb payment system?

2 A. Yeah, probably.

3 Q. And so I believe when we spoke previously,  
4 you said that you used her subscriber information; is  
5 that correct?

6 A. Yes.

7 Q. What is subscriber information?

8 A. Information that she entered when she  
9 subscribed.

10 Q. And so this included the information that she  
11 used when she submitted her credit card to pay for  
12 IMDbPro; is that correct?

13 A. Yes. Her billing details.

14 Q. And so the billing details included, for  
15 instance, the billing address for the credit card?

16 A. Yes.

17 Q. Did you post the billing address for the  
18 credit card?

19 A. No.

20 Q. Did you have any reason to believe that was  
21 inaccurate?

22 A. No.

23 Q. Why didn't you list the billing address for  
24 the credit card?

25 A. Because we don't publish billing addresses

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1 the case and do what we already communicated to her,  
2 which is correct any inaccuracy in the listing, which  
3 is what we already did.

4 Q. And without going into the specifics of  
5 what's being exchanged with counsel here, this e-mail  
6 string is contemporaneous to when you looked at the  
7 subscriber information that we talked about earlier,  
8 correct?

9 MS. ROOS: Object to form.

10 MR. SZEGO: Let me see if I can fix the  
11 form question.

12 Q. (BY MR. SZEGO) If we turn to the front page  
13 of this, the date of the document is November 12,  
14 2008. Is that the time frame where you found my  
15 client's legal name?

16 A. That is the date, yes.

17 Q. Okay. And did you engage in these  
18 communications as a result of the e-mail listed on the  
19 bottom of page 2?

20 A. You mean the message from your client?

21 Q. Yes.

22 A. Yes. I asked legal advice about that.

23 Q. And so you didn't complete the information as  
24 she requested in this e-mail, correct?

25 A. No, we don't.

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1 MS. ROOS: Object to form. Go ahead.

2 A. No. We don't delete information.

3 Q. (BY MR. SZEGO) Do you have with you or have  
4 you seen any correspondence from my client asking that  
5 the date of birth be corrected as opposed to removed?

6 MS. ROOS: Object to form.

7 A. There's a lot of correspondence that has  
8 taken place. I don't remember the content of each one  
9 of them. If you're referring to a specific one, but I  
10 don't recall a specific one.

11 Q. (BY MR. SZEGO) So the answer to the question  
12 -- well, let me reword the question.

13 Can you identify a specific communication  
14 from my client asking that her date of birth be changed  
15 as opposed to removed?

16 MS. ROOS: Object to form.

17 A. I don't remember. I don't have that  
18 correspondence in front of me.

19 Q. (BY MR. SZEGO) Can you recall any time other  
20 than with the submission of credit card information for  
21 payment my client used her legal name with IMDb?

22 MS. ROOS: Object to form.

23 A. I don't -- I'm not aware. I don't recall any  
24 other time.

25 Q. (BY MR. SZEGO) Is it common practice to use

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1 Q. And what are the circumstances under which  
2 you would use PrivateEye.com?

3 A. Well, someone claims that information is  
4 incorrect, and we need to double-check whether that's  
5 the case or not.

6 Q. Do you tell people that you're going to use  
7 PrivateEye.com before you use it?

8 A. No.

9 Q. Do you tell people that you're going to post  
10 the information that results from a PrivateEye.com  
11 search before you post that information?

12 A. When people complain that the information is  
13 incorrect, we tell them that we will look into it and  
14 rectify any inaccuracies.

15 MS. ROOS: Counsel, I'm going to  
16 object. This line of questioning does not fall under  
17 any of the topics that Mr. Cairella is here to testify  
18 regarding.

19 MR. SZEGO: No. 7, "Public records  
20 searches performed by IMDb.com for Plaintiff's legal  
21 name and/or date of birth, including but not limited to  
22 those identified in IMDb.com's responses to Plaintiff's  
23 Interrogatories 6 and 7 and Bates documents  
24 IMDb001053-1086 and documents regarding searches  
25 obtained from Privateeye.com."



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1 MS. ROOS: Yes, so the search on  
2 PrivateEye to plaintiff's legal name is relevant to  
3 that. Other searches on PrivateEye are not. You are  
4 asking more broadly.

5 Q. (BY MR. SZEGO) I'm going to give you a  
6 document which I will have marked as No. 7.

7 THE COURT REPORTER: 6.

8 MR. SZEGO: 6. You're right.

9 (Exhibit No. 6 marked.  
10 for identification, designated  
11 highly confidential - attorneys'  
12 eyes only.)

13 Q. (BY MR. SZEGO) Have you had the opportunity  
14 to review that document to your satisfaction?

15 A. Yes.

16 Q. Can you identify that document for me?

17 A. That is an account summary from my  
18 PrivateEye.com account showing past payment activity in  
19 older records.

20 Q. When you say "my," this isn't a personal  
21 account for you. You use this for business purposes,  
22 correct?

23 A. Correct, but it's under my name.

24 Q. This lists 24 searches done over a period of  
25 a little over a year; is that accurate?

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1           A.    Yes.

2           Q.    Were all of these searches done to correct or  
3   add to IMDb's database?

4           A.    I would have to assume so. I don't remember  
5   every single name on this list, so -- but since that's  
6   what we do, that would be my assumption, yes.

7                   MS. ROOS: Counsel, again, this is not  
8   related to any of the topics listed.

9           Q.    (BY MR. SZEGO) Did any of these searches  
10   result in changes or additions to the IMDb database?

11                   MS. ROOS: Counsel, this is not related  
12   to the topics listed.

13                   MR. SZEGO: Your objection is on the  
14   record.

15                   MS. ROOS: I will ask you to remain to  
16   the topics listed. If you're going to stray, I will  
17   instruct my client not to answer.

18           Q.    (BY MR. SZEGO) Please answer the question.

19           A.    I can't tell. I don't recall the  
20   circumstances of every single one of them, so I can't  
21   tell if in all of these cases information was left as  
22   it already was or if it was changed as a result. These  
23   were searches that took place four years ago.

24           Q.    In any of those cases, did you notify the  
25   subject of the search that you were doing the search on

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1 MR. SZEGO: I want to take a break. I  
2 think I may be done or almost done.

3 MS. ROOS: Okay.

4 THE VIDEOGRAPHER: Going off record.  
5 The time now is 10:18 A.M.

6 (Off the record.)

7 (Exhibit No. 7 marked.  
8 for identification.)

9 THE VIDEOGRAPHER: Back on record. The  
10 time now is 10:27 A.M.

11 Q. (BY MR. SZEGO) I've given you a document  
12 which has been marked as No. 7. And we had you take a  
13 chance to look at that while we were off the record.  
14 Have you had an adequate time to review that document?

15 A. Yes.

16 Q. Can you identify that document to me?

17 A. The first page appears to be the sign-up  
18 screen for IMDbPro.com, and the second and third page  
19 appears to be a printout of some of the help  
20 information or instructions for that process. And the  
21 rest of it, I think there was a privacy policy printout  
22 and a subscriber agreement and all the documents linked  
23 from that page.

24 Q. Now, you said you used subscription  
25 information to obtain my client's legal name; is that

## 1 C E R T I F I C A T E

2 STATE OF WASHINGTON )  
3 ) SS.

4 COUNTY OF PIERCE )

5 I, the undersigned Washington Certified Court  
6 Reporter, pursuant to RCW 5.28.010 authorized to  
7 administer oaths and affirmations in and for the State  
8 of Washington, do hereby certify:9  
10 That the annexed and foregoing deposition  
11 consisting of Pages 1 through 50 of the testimony of  
12 each witness named herein was taken stenographically  
13 before me and reduced to typed format under my  
14 direction;15  
16 I further certify that according to CR 30(e)  
17 the witness was given the opportunity to examine, read  
18 and sign the deposition after the same was transcribed,  
19 unless indicated in the record that the review was  
20 waived;21  
22 I further certify that all objections made at  
23 the time of said examination to my qualifications or  
24 the manner of taking the deposition or to the conduct  
25 of any party have been noted by me upon each said  
deposition;I further certify that I am not a relative or  
employee of any such attorney or counsel, and that I am  
not financially interested in the said action or the  
outcome thereof;I further certify that each witness before  
examination was by me duly sworn to testify the truth,  
the whole truth and nothing but the truth;I further certify that the deposition, as  
transcribed, is a full, true and correct transcript of  
the testimony, including questions and answers, and all  
objections, motions, and exceptions of counsel made and  
taken at the time of the foregoing examination and was  
prepared pursuant to Washington Administrative Code  
308-14-135, the transcript preparation format  
guidelines;I further certify that I am sealing the  
deposition in an envelope with the title of the above

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1 cause and the name of the witness visible, and I am  
2 delivering the same to the appropriate authority;

3 I further advise you that as a matter of firm  
4 policy, the Stenographic notes of this transcript will  
5 be destroyed three years from the date appearing on  
6 this Certificate unless notice is received otherwise  
7 from any party or counsel hereto on or before said  
8 date;

9 IN WITNESS WHEREOF, I have hereunto set my  
10 hand and affixed my official seal this 14th day of  
11 August, 2012.

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